

Amy F. Sorenson, Esq.
Nevada Bar No. 12495
Robin E. Perkins, Esq.
Nevada Bar No. 9891
Margaret G. Foley, Esq.
Nevada Bar No. 7703
SNELL & WILMER L.L.P.
3883 Howard Hughes Parkway, Suite 1100
Las Vegas, NV 89169
Telephone: (702) 784-5200
Facsimile: (702) 784-5252
asorenson@swlaw.com
rperkins@swlaw.com
mfoley@swlaw.com

Attorneys for Defendant Wells Fargo Bank, N.A.,

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

LEONARD FLORES,

Plaintiff,

vs.

WELLS FARGO, N.A.; TEN-X, LLC;
NATIONAL DEFAULT SERVICING
CORP., INC.

Defendants.

CASE NO. 2:16-cv-01676-RFB-NJK

**MOTION TO EXTEND DEADLINE TO
RESPOND TO COMPLAINT**

(Second Request)

Pursuant to Federal Rule of Civil Procedure (“FRCP”) 6(b) and Local Rules (“LR”) IA 6-1 and 7-2(a), Defendant Wells Fargo Bank, N.A. (“Wells Fargo”), by and through its attorneys, hereby files this Motion to Extend Deadline to Respond to Complaint (“Motion”). This Motion is based on the following memorandum of points and authorities, the papers and pleadings on file, and any oral argument the Court may entertain. Wells Fargo seeks an extension to respond to the complaint until **August 26, 2016**.

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MEMORANDUM OF POINTS & AUTHORITIES

On or about June 15, 2016, Plaintiff commenced an action in the Eighth Judicial District Court of the State of Nevada, Clark County, styled *Leonard Flores v. Wells Fargo, N.A., et al.* (Case No. A-16-738484-C). Wells Fargo was served with the summons and complaint on June 17, 2016. On July 15, 2016, Wells Fargo filed its Petition for Removal [Doc. No. 1], removing the action to this Court. Accordingly, pursuant to FRCP 81(c), Wells Fargo's response to the complaint was due on July 22, 2016. On or about July 6, 2016, the parties entered into an agreement whereby Plaintiff granted Wells Fargo an extension of time until August 19, 2016 to respond to the Complaint. Wells Fargo filed a Notice of Agreement For Extension of Time to Respond to Complaint on August 5 [Doc. Nos. 9, 13].

Wells Fargo's counsel was retained just recently, and requires additional time to locate, organize, and review the relevant documents and prepare the appropriate response. Additionally, Wells Fargo's counsel is in trial, the second trial in the last three weeks, until August 15th.

Counsel for Wells Fargo has made efforts by telephone and email to obtain a stipulated extension to respond to the complaint by August 26; however, Plaintiff has not responded to Wells Fargo's requests.

There are currently no scheduled hearings in this case. A short extension to file a response will not unduly delay the proceedings. There will be no adverse effect or prejudice to any of the parties if this Motion is granted.

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CONCLUSION

For the foregoing reasons, Wells Fargo respectfully requests this Court grant the Motion to Extend Deadline to Respond to Complaint and grant Wells Fargo until Friday, August 26, 2016 to respond to the complaint.

Dated: August 9, 2016

SNELL & WILMER L.L.P.

By: /s/ Margaret G. Foley

Amy F. Sorenson, Esq.

Robin E. Perkins, Esq.

Margaret G. Foley, Esq.

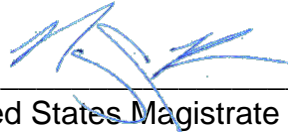
3883 Howard Hughes Parkway, Suite 1100

Las Vegas, NV 89169

Attorneys for Defendant Wells Fargo Bank, N.A.,

IT IS SO ORDERED.

Dated: August 17, 2016



United States Magistrate Judge